

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALGONQUIN GAS TRANSMISSION, LLC,)
Plaintiff,)
v.)
0.247 ACRES OF LAND, MORE OR LESS,)
IN LINCOLN, MASSACHUSETTS, and)
THE CITY OF CAMBRIDGE,)
Defendants.)

No. _____

**PLAINTIFF'S MOTION TO CONFIRM CONDEMNATION OF EASEMENT AND FOR
A PRELIMINARY INJUNCTION AUTHORIZING IMMEDIATE ENTRY**

Pursuant to Fed. R. Civ. P. 65(a), Algonquin Gas Transmission, LLC (“Algonquin”) moves for an order confirming its condemnation of a temporary workspace easement over property owned by the City of Cambridge (“City”) and for a preliminary injunction authorizing Algonquin to immediately enter the City’s property to perform necessary maintenance and replacement of its interstate natural gas pipeline facilities. In support hereof, Algonquin relies upon its Memorandum of Law and the Affidavit of Charles Peabody submitted herewith.

WHEREFORE, Algonquin requests that this motion be allowed.

REQUEST FOR ORAL ARGUMENT

Algonquin requests oral argument in connection with this motion.

ALGONQUIN GAS TRANSMISSION, LLC

By its attorneys,

/s/ Frank N. Gaeta

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